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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Miguel Sanchez,
Plaintiff,
vs.
Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

) Case No. 1:21-cv-00907-AWI-BAM

) STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 4-day extension of time, from August 11, 2022 to August 15, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's third request for an extension of time. Counsel for the Plaintiff is currently out of State attending to an emergency with her ill father. (see

1 attached declaration). Additional time will be needed in light of limited access to
2 her computer.

3 Counsel requires additional time to brief the issues thoroughly for the
4 Court's consideration. Defendant does not oppose the requested extension.
5 Counsel apologizes to the Defendant and Court for any inconvenience this may
6 cause.

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8 Respectfully submitted,

9 Dated: August 11, 2022 PENA & BROMBERG, ATTORNEYS AT LAW
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11 By: /s/ Dolly M. Trompeter
12 DOLLY M. TROMPETER
13 Attorneys for Plaintiff

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15 Dated: August 11, 2022 PHILLIP A. TALBERT
16 United States Attorney
17 PETER K. THOMPSON
18 Acting Regional Chief Counsel, Region IX
19 Social Security Administration

20 By: */s/ Caspar I. Chan
21 Caspar I. Chan
22 Special Assistant United States Attorney
23 Attorneys for Defendant
24 (*As authorized by email on August 11, 2022)

1 **ORDER**
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3 Pursuant to the parties' stipulation, and good cause appearing, Plaintiff's
4 request for a brief extension of time to file an Opening Brief is GRANTED.
5 Plaintiff's Opening Brief shall be filed on or before August 15, 2022. All other
6 deadlines in the Court's Scheduling Order are modified accordingly.

7 IT IS SO ORDERED.
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9 Dated: August 12, 2022

/s/ Barbara A. McAuliffe

10 UNITED STATES MAGISTRATE JUDGE

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